

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 20-113 (DSD/BRT)**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	MOTION FOR DISCLOSURE
)	OF 404(b) EVIDENCE
JOSE A. FELAN, JR.,)	
)	
Defendant.)	

Defendant, Jose Felan, by and through his undersigned counsel, Sicoli Law, Ltd., and Robert D. Sicoli, hereby moves the Court for an Order requiring the government to disclose at least 14 days before trial whether it intends to produce evidence of other crimes, wrongs, or acts against him, pursuant to Rule 404(b), Federal Rules of Evidence, or as may be relevant to sentencing pursuant to the Sentencing Reform Act of 1984, 28 U.S.C. §§991-998 (1977), and if so, to disclose the particulars of each other crime, wrong or act.

This Motion is based on the Indictment and upon all of the files and records herein, including anything that may be presented to the Court at or prior to the time of hearing of said Motion.

Dated: June 1, 2021

Respectfully submitted,

SICOLI LAW, LTD.

By: /s/ Robert D. Sicoli
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